

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

DANIEL WHITMAN

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DOCKET NO. 1:21-mj-06000-MPK

MOTION TO MODIFY CONDITIONS OF PRETRIAL RELEASE

Defendant, through counsel, respectfully moves this court to modify the conditions of Mr. Whitman's pretrial release to allow him to travel on a Jet Blue flight from Logan Airport in Boston to Fort Myers in Florida on Tuesday, April 27, 2021 and return to Boston on a Jet Blue flight from Fort Myers in Florida on Sunday, May 2, 2021. This travel will be for recreational purposes. He and his spouse would be staying in a hotel with two couples who are friends. He will be reachable by telephone and is prepared to provide his supervising officer, USPO Romina Chorres, with a detailed itinerary of his trip.

As grounds for this motion, counsel states that Mr. Whitman has been on supervision since January 6, 2021 and has not violated any conditions of release since his initial appearance on that date. The government agreed to his release from custody at that time. At present time, his travel is restricted to the states that comprise "New England".

Assistant United States Attorney Genie Carris objects to this request.

Respectfully submitted,
DANIEL WHITMAN
By his Attorney,
/s/Oscar Cruz
B.B.O. # 630813
Federal Defender Office
P.O. Box 51268
Boston, MA 02205
Tel: 617-223-8061

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on April 7, 2021.

/s/ Oscar Cruz, Jr.
Oscar Cruz, Jr.